

Exhibit 3

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
-----x

3 UNITED STATES OF AMERICA,

4 v.

19 Cr. 789 (PGG)

5 JELANI WRAY,

6 Defendant.

Plea

7 -----x
8 New York, N.Y.
9 October 12, 2021
10 10:00 a.m.

11 Before:

12 HON. SARAH NETBURN,

13 Magistrate Judge

14 APPEARANCES

15 DAMIAN WILLIAMS

16 United States Attorney for the
17 Southern District of New York

LOUIS PELLEGRINO

18 Assistant United States Attorney

KENNETH J. MONTGOMERY

19 Attorney for Defendant

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1 with Rose and others. He also recruited attorneys and clinics
2 to participate in the scheme.

3 Do you acknowledge and accept that statement as true?

4 THE DEFENDANT: Yes.

5 THE COURT: Paragraph 3: Wray received approximately
6 40 percent of the profits from the 911 operators and agreed to
7 cover a portion of the call center's expenses. Wray concealed
8 his bribery of the 911 operators by providing them prepaid
9 burner phones using encrypted messaging applications to
10 communicate with them and assigning them code names beginning
11 with the letter G. Wray ceased paying the 911 operators in or
12 about 2017 because the NYPD was conducting an internal
13 investigation into bribery in the 911 dispatch unit.

14 Do you acknowledge and accept those statements as
15 true?

16 THE DEFENDANT: Yes.

17 THE COURT: Paragraph 4: Rose and Wray further
18 received kickbacks for steering victims to a particular MRI
19 facility. From at least in or about 2016 up to and including
20 November 2019, a coconspirator (CC-1) agreed to pay Rose and
21 Wray to send motor vehicle accident victims to a particular MRI
22 facility located in Howard Beach, New York (MRI facility-1).
23 CC-1 agreed to pay approximately \$150 per patient. Wray
24 provided patients using Rose's call center and by bribing
25 clinic managers to send patients to MRI facility-1. CC-1 was

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1 aware that Wray was paying bribes.

2 Do you acknowledge and accept as true the statements
3 in paragraph 4?

4 THE DEFENDANT: Yes.

5 THE COURT: Paragraph 5: In addition, in or about
6 2017, Rose, Wray, a paralegal (Paralegal-1) and a physician
7 (Physician-1) agreed to open a medical clinic in the Bronx
8 (Clinic-1). Wray funded Clinic-1 and exercised substantial
9 control over its operation. Among other things, Wray hired and
10 fired numerous medical personnel (including acupuncturists and
11 chiropractors) and required these persons to pay kickbacks for
12 patients. Wray also required the clinic, (a), to use his
13 company to provide durable medical equipment to patients, (b),
14 to send patients to a particular MRI facility located in New
15 Jersey (MRI facility-2), and a particular surgical center
16 located in New Jersey (Surgical center-1), and (c) to use
17 particular pharmacies to supply prescriptions to patients.
18 Wray received kickbacks for these referrals. Wray split
19 several of these kickbacks with Paralegal-1. Wray sold
20 Clinic-1 in 2019 to start another clinic with Physician-1.

21 Sir, do you acknowledge and accept as true the
22 statements in paragraph 5?

23 THE DEFENDANT: Yes.

24 THE COURT: Paragraph 6: Following his arrest in
25 November 2019, Wray destroyed his burner phones and deleted all

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1 data from Apple's storage cloud, iCloud. Wray did so with the
2 intention of destroying evidence. Wray additionally lied to
3 federal agents about his participation and the participation of
4 others in the scheme on two separate occasions.

5 Do you acknowledge and accept as true the statements
6 in paragraph 6?

7 THE DEFENDANT: Yes.

8 THE COURT: Thank you.

9 Mr. Pellegrino, anything further that you would like
10 me to ask the defendant at this time?

11 MR. PELLEGRINO: No. Thank you, your Honor. I just
12 note from my notes, when I gave the elements previously, I
13 didn't state what the government's proof at trial was. So I
14 can do that at any time the Court would like me to.

15 THE COURT: Please. I was going to ask you whether or
16 not you believed there was a sufficient factual predicate for
17 the guilty plea.

18 MR. PELLEGRINO: We do. Yes, your Honor.

19 And the government's proof at trial would include,
20 among other things, records that recipients of bribe payments
21 worked at either a hospital that received federal funding or at
22 the NYPD, which receives federal funding; testimony and records
23 showing that that hospital or the NYPD received in excess of
24 \$10,000 annually as part of a federal program. In addition,
25 there would be recorded calls and text messages between the